



## DIVERSITY DATA POLICY

1. This policy sets out how and why Selborne Chambers (“Chambers”) collects and retains Diversity Data.
2. The name of Chambers’ registered data controller is Ian Clarke QC and the data controller's registration number on the Data Protection register is Z714367X.
3. The name of the Diversity Data Officer is Lara Kuehl. She may be contacted at [lara.kuehl@selbornechambers.co.uk](mailto:lara.kuehl@selbornechambers.co.uk) or on 020 7420 9579.

### Collection of Diversity Data

4. Members and employees of Chambers are to be given the opportunity to provide their Diversity Data for collection in accordance with the Bar Standard Board’s requirements.
5. The Diversity Data Officer shall be responsible for arranging and supervising the collection of Diversity Data.

### Why Diversity Data is collected

6. Individuals have the opportunity to provide their Diversity Data in order for Chambers to publish an anonymous summary of the Diversity Data. This provides transparency concerning recruiting and employment activities and aims to encourage an independent, strong, diverse and effective legal profession.
7. **Please note that you are not required to provide your Diversity Data. You are free to choose whether or not you wish to provide all, some or none of your Diversity Data.**

### How Diversity Data is collected

8. Diversity Data will be collected by completing a questionnaire which may be returned to the Diversity Data Officer in hardcopy (in a sealed envelope placed in her pigeonhole) or electronically to [lara.kuehl@selbornechambers.co.uk](mailto:lara.kuehl@selbornechambers.co.uk). You will be provided with a copy of the

form by email, together with a consent form which you must complete if you wish to provide your Diversity Data.

9. If you are unable to complete the questionnaire in the format provided and would like it to be provided to you in a different format, please contact the Diversity Data Officer.

#### **Keeping Diversity Data secure**

10. All Diversity Data that is collected from individuals will be kept securely. The Diversity Data Officer shall put the following security measures in place to protect Diversity Data:
  - (a) Hardcopy documents will be scanned and then disposed of in Chambers' confidential document bins.
  - (b) Electronic documents (including scanned copies of any hardcopy documents) will be encrypted using "Boxcryptor" software and kept in a secure Dropbox account.
11. The Diversity Data Officer will not share Diversity Data with any third parties, save as set out in paragraph 4 above. Should you access or disclose Diversity Data accidentally or intentionally when you are not authorised to do so, you must notify the Diversity Data Officer immediately.

#### **Anonymising Diversity Data**

12. The Diversity Data Officer is required to anonymise Diversity Data before publishing it in summary form. She will securely anonymise Diversity Data by separating it from any documents containing the names of individuals (e.g., a covering email or letter).

#### **Publication of the anonymised summary of Diversity Data**

13. The Diversity Data Officer is required to publish Diversity Data in an anonymised summary format within the 3-month period following the date for collection specified by the Bar Standards Board. The summary will break down the information in a way which categorises

each diversity characteristic against job status and role, in a manner which reflects seniority within Chambers. The summary will be published on Chambers' website.

14. Diversity Data relating to sexual orientation and religion or belief will not be included in the anonymised summary format for publication.
15. Where there are fewer than 10 individuals within each published category who identify through the questionnaire with the same diversity characteristic (for example, 4 individuals with a job role at the same level of seniority identify themselves as disabled), the Diversity Data Officer shall not publish the anonymous data relating to those individuals and that diversity characteristic unless the individuals concerned have each consented to such publication, in the knowledge that they may be identified against that characteristic.

#### **Destruction of Diversity Data**

16. The Diversity Data Officer shall securely destroy the Diversity Data collected promptly after the Diversity Data has been anonymised and in any event within 3 months following the date for collection specified by the Bar Standards Board (usually the date you receive notification under paragraph 6 above). Secure destruction means that as far as possible the Diversity Data Officer shall not hold the Diversity Data in any way where it is possible to identify an individual. Anonymised data will be kept for 12 months before being destroyed as above.

#### **Questions or complaints**

17. You have a right to withdraw your consent or object to the use of their Diversity Data at any time. Where your data has already provided and you wish to withdraw your consent to its use, please notify the Diversity Data Officer in writing at [lara.kuehl@selbornechambers.co.uk](mailto:lara.kuehl@selbornechambers.co.uk). She will promptly delete or destroy any Diversity Data which includes your personal data and will confirm to you that this step has been taken within 21 days of receiving notification from you.
18. Where the anonymised data has been published in summary form, the Diversity Data Officer will not extract your personal data from the published summary unless you have reason to believe that continued publication of the anonymised data is causing or is likely to cause you or someone else substantial damage or distress. In such circumstances, the Diversity Data



Officer will consider the reasons you have put forward and shall respond within 21 days from the date you notify her of your belief to let you know whether she has determined that the continued publication of the data is justified and, if not, to confirm the action taken to extract your data from the published summary and to delete or destroy any copies.

19. Should you have any questions or complaints about this Diversity Data Policy, please contact the Diversity Data Officer on [lara.kuehl@selbornechambers.co.uk](mailto:lara.kuehl@selbornechambers.co.uk).
20. This policy was adopted on the date below and will be reviewed by the Diversity Data Officer in 12 months from that date.

Approved by the Board, 24 April 2019